KINGSTONE ACADEMY TRUST

APPROVED POLICY DOCUMENT

Safeguarding and Child Protection Policy	
Relevant School/s:	**KHS and KTPS**
Policy Officer:	**A Preece (KTPS) and D Cook (KHS)**
Approved By:	**Board of Trustees**
Date of Review:	**September 2025 (V4)**
Next Review:	**Annually or in light of changes to legislation**
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School Acknowledgement

At Kingstone Academy Trust, we are committed to safeguarding and child protection in line with the statutory guidance.
As required, all staff have read and understood part one of Keeping Children Safe in Education (2024).

Key Staff responsible for meeting the child protection and safeguarding requirements at Kingstone Academy Trust:

- **Elissa Vigus** – Chief Executive Officer, and Safer Recruitment Trained
- **Matthew Morris** – Head of School (Kingstone High School). Safer Recruitment Trained
- **Amy Preece** –Head of School, (Kingstone and Thruxton Primary School) Designated Safeguarding Lead. Safer recruitment trained.
- **Dave Cook**– Designated Safeguarding Lead for Kingstone High School
- **Vic Seymour, Letitia Morris, Megan Walsh, Mandy Darcy** – Deputy Designated Safeguarding Leads for Kingstone High School.
- **Katie Wilson** - Deputy Designated Safeguarding Lead (KTPS)
- **Joe Bull** – Deputy Designated Safeguarding Lead (KTPS)
- **Natasha Exley** – Deputy Designated Safeguarding Lead (KTPS)
- **Maureen Douglas** - Safeguarding and Child Protection Link Trustee 1
- **Andrew Coates** – Safeguarding and Child Protection Link Trustee 2

DSLs at both schools are also the Single Points of Contact for:

- Prevent SPOC
- Operation Encompass SPOC
- Designated teacher for Children looked after (Paige Bythell - Nicholl at KHS)
- Designated teacher for Children with a social worker

Local Multi Agency Safeguarding Arrangement

Note:

The Children and Social Work Act 2017 (the Act) replaced Local Safeguarding Children Boards with new local safeguarding arrangements led by three safeguarding partners (local authorities, chief officers of police and clinical commissioning groups). The Act places a duty on those partners to make arrangements for themselves and **relevant agencies** they deem appropriate to work together for the purpose of safeguarding and promoting the welfare of children in their area. Education is one of the relevant agencies. In Herefordshire, the arrangements are referred to as the Herefordshire Safeguarding Children Partnership.

Other relevant Kingstone Academy Trust policies / procedures which should be read in conjunction with this policy are:

- Anti-racism Policy
- Anti-Bullying Policy
- Internet / e-safety
- Equality Policy – (and Equality Statement for the setting)
- Supporting Students and Pupils with Medical Needs Policy
- Educational Visits Policy
- Attendance Policy
- Behaviour Management & Physical Intervention Policy
- Admissions Policy
- Whistleblowing (Confidential Reporting Policy)
- Sex & Relationships Education Policy
- Screening, Searching & Confiscation Policy
- GDPR Policy & Privacy Notices
- Child on Child Abuse Policy (formerly known as Peer on Peer Abuse Policy)

A Safer School Culture

- the culture of this school is one that is safe for children and unsafe for adults that may pose a risk to children

- there is a belief that safeguarding is the responsibility of all adults working or volunteering within the organisation and that all concerns will be reported to the Designated Safeguarding Lead or Head Teacher when concerns relate to an adult

- the school has a culture of listening to, and hearing the voice of the child

- the school ensures victims are taken seriously and allegations are responded to appropriately

SAFEGUARDING POLICY

Ratified by Kingstone Academy Trust Trustees on **29th September 2022 (V1)**
To be reviewed (annually) **September 2026**
Version number: **4**

1. Introduction

Safeguarding is defined as:

- protecting children from maltreatment
- preventing impairment of children's mental and physical health or development;
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

Child Protection is defined as:

- the activity that is undertaken to protect specific children who are suffering or likely to suffer significant harm. (Working Together, DfE 2018)

This includes, but is not limited to, safeguarding children in specific circumstances, such as:

Neglect	Physical abuse
Emotional abuse	Sexual abuse
Bullying, including online and prejudice-based bullying	Racist, disability and homophobic or transphobic abuse
Gender based violence / violence against women and girls	Radicalisation and /or extremist behaviour
Child Sexual Exploitation and trafficking	The impact of new technologies on sexual behaviour: e.g. Youth Produced Sexual imagery
Teenage relationship abuse	Substance abuse
Gang / youth violence including initiation / hazing	Domestic abuse / violence
Female Genital Mutilation	Forced Marriage

Fabricated / induced illness	Poor parenting
Online including grooming via social networking, online gaming, video messaging	Child on Child abuse
Self Harm behaviours	Children with mental health difficulties or illness
Up skirting	Contextual/extra familiar risks

Kingstone Academy Trust is committed to safeguarding and promoting the welfare of all its children. We believe that:

- all children/young people have an equal right to be protected from harm
- children/young people need support which matches their individual needs, including those who may have experienced abuse
- all children/young people have the right to speak freely and voice their values and beliefs
- where there is a safeguarding concern, governing bodies, proprietors and school or college leaders should ensure the child's rights, wishes and feelings are taken into account when determining what action to take and what services to provide
- all children/young people must be encouraged to respect each other's values and support each other
- all children/young people have the right to be supported to meet their emotional and social needs as well as their educational needs
- schools can and do contribute to the prevention of abuse, victimisation, bullying, exploitation, extreme behaviours, discriminatory views and risk taking behaviours which may be perceived to be 'risky'
- all staff, volunteers and visitors have an important role to play in safeguarding children and protecting them from abuse.
- the school/setting have a zero tolerance approach to sexual violence and sexual harassment

Kingstone Academy Trust will fulfil their local and national responsibilities as laid out in the following documents:-

- Department for Education Working Together to Safeguard Children, December 2023
- 'Safeguarding Children and Safer Recruitment in Education' issued April 2012
- Relevant sections of the Children Act 2004
- Keeping Children safe in Education Sept 2024
- UKCCIS guidance: Sexting in schools and Colleges, responding to incidents and safeguarding young people Sept 2016

- Sharing nudes and semi-nudes: advice for education settings working with children and young people Dec 2020
- Safer working practice Feb 2022
- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person on a school interview/appointment panel to be trained in safer recruitment techniques
- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- The Human Rights Act
- The Equality Act 2010
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counterterrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- Where a school or college has charitable status, Charity Commission guidance on charity and trustee duties to safeguard children is available at Charity Commission Guidance

Keeping Children Safe in Education has been extended from early years, schools and colleges to cover 16-19 academies (and apprenticeships).There is reference to the Education and Training (Welfare of Children) Act 2021 which amends the Education Act 2002 and the Apprenticeships, Skills, Children and Learning Act 2009 and places safeguarding duties on 16 to 19 academies and further education to ensure that safeguarding responsibilities are understood and prohibiting funding being given if safeguarding requirements not complied with.
Kingstone Academy Trust will ensure that child protection policies should include procedures for dealing with Child on Child abuse

2. The Designated Safeguarding Leads

The Designated Safeguarding Leads – Amy Preece (KTPS) and Dave Cook (KHS), are members of the Senior Leadership Team and take lead responsibility for coordinating all child protection activity within the school. They will provide support to staff members to carry out their safeguarding duties and will liaise closely with other services such as the early help hub, children's social care, health, police etc. This school-specific person has lead responsibility and holds the management oversight for safeguarding and child protection.

The Designated Safeguarding Lead (DSL) is supported by the following Deputy Designated Safeguarding Lead/s (DDSL):

- **Vic Seymour (KHS – Year 10), Letitia Morris (KHS – Year 11), Laura Roden (KHS – Year 7) Mandy Darcy (KHS – Years 8&9)** – Deputy Designated Safeguarding Leads for Kingstone High School.
- **Katie Wilson** - Deputy Designated Safeguarding Lead (KTPS)
- **Joe Bull** – Deputy Designated Safeguarding Lead (KTPS)
- **Natasha Exley** – Deputy Designated Safeguarding Lead (KTPS)

Deputy Designated Safeguarding Leads are trained to the same level as the Designated Safeguarding Lead and will undertake this role operationally with direct oversight and management from the Designated Safeguarding Lead who maintains lead responsibility.

2.1 Responsibility and Actions

When the school has concerns about a child, the Designated Safeguarding Lead or Deputy will decide what steps should be taken in accordance with the Right Help Right Time document and initiate a response accordingly. This may include providing a single agency early help response, undertaking effective support or Graded Care Profile 2 or referral to Children's Social Care for a statutory social work assessment. The Head Teacher will be kept appraised of cases as appropriate.

- DSL/School/setting will refer to the Model Setting Concern Process if a concern becomes apparent regarding a child. For further information, please see appendix 10.

- the Designated Safeguarding Lead will support staff who make referrals to the Local Authority Children's Social Care and act as a source of support, advice and expertise for all staff

- the DSL and deputies should liaise with the three safeguarding partners and work with agencies in line with Working Together to Safeguard Children (2023), the NSPCC – when to call police should help the DSL understand when they should consider calling the police and what to expect if they do so.

- the Designated Safeguarding Lead will refer cases to the Police where a crime may have been committed. Designated Safeguarding Leads will report appropriate incidents irrespective of whether or not the individual concerned wants to pursue it as there have been increased cases of them not doing it.

- the Designated Safeguarding Lead will seek advice in regard to safeguarding matters related to radicalisation and make referrals to Channel as required

- the Designated Safeguarding Lead will liaise with the Designated Senior Manager for allegations to ensure where necessary referrals have been made to the Disclosure and Barring Service when a person is dismissed or resigned due to risk/harm to a child

- the Designated Safeguarding Lead will lead regular case monitoring reviews of vulnerable children. These reviews, together with any actions arising from the review and the rationale for decision-making will be recorded in case files

- the Designated Safeguarding Lead will ensure safeguarding and child protection information is dealt with in a confidential manner and in accordance with the HSCP's information sharing guidance.

- the Designated Safeguarding Lead understands that compliance is measured via the annual audit return, as per the statutory duty to safeguard children across the local authority

- staff will be informed of relevant details only when the Designated Safeguarding Lead feels their having knowledge of a situation will improve their ability to deal with an individual child and / or family

- Child Protection information will be dealt with in a confidential manner. Staff will be informed of relevant details only when the Designated Safeguarding Lead feels their having knowledge of a situation will improve their ability to deal with an individual child and/or family. A written record will be made of what information has been shared with whom, KAT uses the 'MyConcern' software to record all incidents.

- The Designated Safeguarding Lead will ensure that safeguarding and child protection records are stored securely in a central place separate from academic records. Individual files will be kept for each child in MyConcern; the school will not keep family files. Files will be kept for at the least the period during which the child is attending the school, and beyond that in line with current data retention legislation.

- the Designated Safeguarding Lead will ensure access to safeguarding and child protection records by staff other than by the Designated Safeguarding Lead is

restricted, and a written record will be kept of who has had access to them and when

- the Designated Safeguarding Lead will ensure parents are usually (subject to the point below) aware of information held on their children and are kept up to date regarding any concerns or developments by the appropriate members of staff

- general communications with parents will be in line with any home school policies and give due regard to which adults have parental responsibility

- the Designated Safeguarding Lead will ensure that for best practice, case load supervision occurs regularly to identify next steps and escalation, in order to provide the best outcomes for children

- **The Designated Safeguarding Lead will not disclose to a parent any information held on a child if this would put the child at risk of significant harm.** In such circumstances, advice will be sought from Children's Social Care.

  If a child moves from the school, the Designated Safeguarding Lead will ensure safeguarding records are forwarded on to the Designated Safeguarding Lead at the new school, with due regard to their confidential nature and in line with current government guidance on the transfer of such records. Direct contact between the two schools may be necessary, especially on transfer from primary to secondary schools. The school will record where and to whom the records have been passed and the date which should be within 5 days.

- If sending by post, children's records will be sent by "Special/Recorded Delivery". For audit purposes, a note of all children's records transferred or received should be kept in either paper or electronic format. This will include the child's name, date of birth, where and to whom the records have been sent and the date sent and/or received.

- if a child is permanently excluded and moves to a Pupil Referral Unit or Alternative Learning Provision, child protection records will be forwarded on to the relevant organisation

- if a child is being removed from school roll in order to be home educated, the school will ensure all relevant safeguarding information is shared with the Elective Home Education team and a meeting is held in line with the Herefordshire Elective Home Education policy.

- where a vulnerable young person is moving to a Further Education establishment, consideration should be given to the student's rights, wishes and feelings on their child protection information being passed on in order that the FE establishment can provide appropriate support

- when a Designated Safeguarding Lead resigns their post or no longer has child protection responsibility, there should be a full face-to-face handover/exchange of information with the new post holder. This exchange should be recorded as part of the incoming role holder's induction/performance management.

- in exceptional circumstances when a face-to-face handover is not feasible, the Head Teacher / Principal will ensure that the new post holder is fully conversant with all procedures and case files

3. Overall Aims

This policy will contribute to safeguarding our children and promoting their welfare by:

- clarifying standards of behaviour for staff and children
- contributing to the establishment of a safe, resilient and robust ethos in the school, built on mutual respect, and shared values
- creating an organisational culture that is safe for children
- introducing appropriate work within the curriculum
- encouraging children and parents to participate
- developing staff's awareness of the risks and vulnerabilities children face to enable them to recognise and respond to concerns
- addressing concerns at the earliest possible stage in the least intrusive way
- capturing the child's voice where possible

4. Key Principles

- always see the child first and consider what life is like for the child, maintaining a culture of vigilance
- provide support and intervention at the earliest possible opportunity in the least intrusive way in accordance with the Right Help Right time document to identify what is the best support for the family at the time
- have conversations, build relationships and maintain professional curiosity
- focus on securing improved outcomes for children
- build a culture of openness and transparency where all staff are able to demonstrate understanding of their role and responsibility to safeguard and promote the welfare of children
- every child is entitled to a rich and rounded curriculum
- when issues arise, head teachers should speak out, addressing them internally where possible and engaging in a multi-agency response when required in accordance with interagency procedures

5. Key Processes

All staff should be aware of the guidance issued by the HSCP within the Right Help Right Time document in order to secure support and intervention for children and young people at the earliest possible opportunity in the least intrusive way

This document is integral to safeguarding children in Herefordshire educational establishments and will always be used to underpin decision-making.

6. Expectations

All staff and regular visitors will:

- be familiar with this safeguarding policy and implement this consistently in the course of their work with children and young people
- be aware of the role and identity of the designated safeguarding leads and deputies for the school
- undertake referrals of child protection concerns to Children's Services in the absence of the designated safeguarding officer and be aware of the statutory assessments under Section 17 and Section 47 of the Children Act 1989 that they may contribute to
- be subject to safer recruitment processes and checks, whether they are new staff, supply staff, contractors, volunteers etc.
- be involved in the implementation of individual education programmes, early help assessments and plans, child in need plans and interagency child protection plans
- be alert to signs and indicators of safeguarding concerns and possible abuse
- record concerns and pass the record to the Designated Safeguarding Lead **Amy Preece (KTPS) / Dave Cook (KHS)**
- recognise and respond to concerns about the behaviour of staff, students and volunteers which indicates they may pose a risk of harm to children following interagency procedures agreed by the HSCP
- deal with a disclosure of abuse from a child in line with the guidance in Appendix Two
- all staff will receive single agency foundation training at the point of induction. This will be regularly updated at a minimum of two-year intervals
- the designated safeguarding lead together with named deputies will undertake additional higher level training in order to ensure they have appropriate knowledge and skills to undertake the role and will utilise these training opportunities available

from the HSCP and other organisations as agreed by the Board of Trustees. This training will be regularly updated at a minimum of two-yearly intervals

- in addition to the above, all staff will receive annual safeguarding updates, which may include E-learning, circulation of information and guidance internally, staff meetings, inset training
- the subject / topics for training and updates will take into consideration HSCP priorities, local context and needs of pupils and identified training needs of staff
- be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This will not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.

7. Operation Encompass

At Kingstone Academy Trust, we are working in partnership with Herefordshire Council and West Mercia Police to identify and provide appropriate support to pupils who have experienced domestic abuse in their household; nationally and locally, this scheme is called Operation Encompass. In order to achieve this, the police will share information with the Herefordshire MASH of all domestic incidents where one of the pupils in the school has been affected. On receipt of any information, the Education MASH representative will inform the school and advise on any support the child may require. All information sharing and resulting actions will be undertaken in accordance with the 'Operation Encompass guidance for schools'. The information will be recorded and stored it in accordance with the record keeping procedures outlined in this policy.

8. Responsibilities and Actions of the Board of Trustees

The Board of Trustees will:

- ensure that they comply with their duties under legislation

- ensure they facilitate a whole school or college approach to safeguarding, this means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

- have regard to Keeping Children Safe in Education 2025 to ensure that the policies, procedures and training are effective and comply with the law at all times

The Board of Trustees will ensure that:

The school contributes to inter-agency working in line with the statutory guidance within 'Working Together to Safeguard Children 2023'. This includes providing a co-ordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans

- the school provides an appropriate safeguarding response in accordance with the Right Help Right Time document and local safeguarding procedures in order to safeguard children

- the school provides a Child on Child abuse policy if they do not choose to adopt the local authority model Child on Child abuse policy

- procedures are in place within the child protection policy to minimise Child on Child abuse and these are well understood across all staff

- online safety is considered with increasing work online, which poses concerns around potentially harmful and inappropriate online material. Governing bodies will ensure that appropriate filters and monitoring systems are in place.

- the school complete regular updated safeguarding training, including online safety training and ensure that children are taught about safeguarding and online safety.

- safeguarding training for staff, including online safety training, is considered as a whole school approach to safeguarding and curriculum planning

- the school maintains information about the legal status of all children including whether a looked after child is subject to S20 voluntary, interim or full care order, contact details for persons with parental responsibility, level of delegated authority, details of the social worker and the virtual head in the authority that looks after the child

- there is a designated teacher with the appropriate training skills and knowledge appointed to promote the academic achievement of looked after children and children previously looked after

- the school/DSL consider the procedures and practice of the Local Authority as part of the inter-agency procedures set up by the Multi Agency Safeguarding Arrangement (HSCP). This includes working with Children's Social Care from other authorities when children attend school in Herefordshire but live outside of Herefordshire.

- the school shares information with other professionals in the interests of safeguarding children in accordance with the guidance within Working together to safeguard children 2023: statutory guidance (publishing.service.gov.uk) and https://assets.publishing.service.gov.uk/media/66320b06c084007696fca731/Info_sharing_advice_content_May_2024.pdf

- the school follows local procedures for sharing intelligence in relation to Child Sexual Exploitation with West Mercia Police and the Point of Contact for CSE within Herefordshire Council
- the school initiates appropriate safeguarding responses to children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse, exploitation or radicalisation and to help prevent the risks of them going missing in future

- that the Headteacher ensures that safeguarding policies and procedures which have been adopted by the Board of Trustees are consistently implemented

- the school has a staff behaviour policy (sometimes called the code of conduct) which should, amongst other things, include staff/child relationships and communications including the use of social media and other online platforms

- the school has procedures for managing allegations and low level concerns about adults that work or volunteer with children and that these include the procedures for making referrals to the Disclosure and Barring Service, LADO and TRA as the teaching professional body where appropriate

- the school operates, safer recruitment procedures and ensures that appropriate checks are carried out on all new staff and relevant volunteers in accordance with Keeping Children Safe in Education 2025, including pre-recruitment checks for shortlisted candidates.

- the Designated Safeguarding Lead is a member of the Senior Leadership Team and has lead responsibility for safeguarding which is not delegated. This is clearly defined within the role holder's job description and this person must have the appropriate authority, time, training, funding and resources to undertake this role as per Appendix B of Keeping Children Safe in Education, 2025, the Designated Safeguarding Lead maintains management oversight of any work undertaken by the Deputy Designated Safeguarding Lead

- any Deputy Designated Safeguarding Lead has the appropriate training skills and knowledge to undertake the operational function of the Designated Safeguarding Lead as per appendix B of Keeping Children Safe in Education 2025

- the Designated Safeguarding Lead and any Deputies undertake HSCP higher level training to ensure they have the appropriate training, skills and knowledge to carry out this role. In addition, the Designated Safeguarding Lead and any Deputies will update their knowledge by receiving safeguarding updates via the designated safeguarding officer network events, attendance at training and learning events offered by the HSCP, online updates via NSPCC or attendance at professional development events

- the Head Teacher / Principal and all other staff who work with children undertake safeguarding training in accordance with Keeping Children Safe in Education 2025and that they receive annual safeguarding updates to ensure their continued professional development

- these updates take account of HSCP priorities, the local context, the needs of the pupils and other identified training needs

- there is a policy as cited in KCSIE (2025) that provides a response to low level concerns

- all training will incorporate safeguarding children in specific a circumstance that includes, but is not limited to Child Sexual Exploitation (CSE), Female Genital Mutilation (FGM), vulnerability to radicalisation and Child on Child abuse

- the training will ensure that Child on Child abuse is never seen as ‘banter’ or part of growing up and incorporates issues of sexually harmful behaviours such as sexual touching or assault and gang initiation or hazing type violence. The training recognises how alcohol use, drug use, truanting and youth generated sexualised imagery increases risks of harm to children. In addition, the training will also ensure staff have the skills and knowledge about the additional vulnerability of Looked After Children

- the school has appropriate safeguarding responses for children who go missing from education which should include holding more than one emergency contact number for pupils

- temporary staff and volunteers are made aware of the school’s policies and procedures for child protection and their responsibilities

- the school remedies any deficiencies or weaknesses brought to its attention without delay; and recognises the importance of utilising the expertise of the

Designated Safeguarding Lead and Deputies in shaping safeguarding arrangements

- there are appropriate online filtering and monitoring systems within the school which safeguards children from accessing inappropriate or harmful online material. Over blocking of material which could impair children's independent research and learning will be avoided

- the school and Board of Trustees understand that within alternative provisions, children may have complex needs and may have an additional risk of harm; trustees and school leaders understand that they continue to be responsible for the safeguarding of pupils placed with an alternative provider (see further information via https://www.gov.uk/government/publications/high-needs-funding-arrangements-2024-to-2025/high-needs-place-process-alternative-provision-ap-free-school-guidance-for-2024-to-2025--2 and https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/942014/alternative_provision_statutory_guidance_accessible.pdf

- that the curriculum is delivered in such a way to include educating children about how to stay safe which will include Relationships and Sex Education (RSE), online safety and broader safeguarding messages within PSHE.

- there are processes in place which enable children and young people to express their rights, wishes and feelings and provide feedback

The Board of Trustees reviews its policies/procedures annually (further details on specific policies are cited in KCSIE (2025)

- the nominated trustee for child protection at the school is **Maureen Douglas.** The nominated governor is responsible for liaising with the Head Teacher and Designated Safeguarding Lead over all matters regarding child protection issues.

- The board of trustees will ensure that appropriate policies are in place in order for appropriate action to be taken in a timely manner to support children's welfare

- the role is strategic rather than operational; they will not be involved in concerns about individual children

- should ensure that all trustees receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

- a member of the Board of Trustees, usually the chair, is nominated to liaise with the designated officer(s) from the relevant local authority and partner agencies in the event of allegations of abuse made against the Head Teacher.

- should be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements.

9. ICT Systems

Each site's Network Manager (current SLA provider is D&D Network Services) is responsible for maintaining safe systems of internet access, blocking any undesirable (e.g. pornographic, racist, violent) sites. This includes checking that:

- The IT infrastructure in the schools are secure and meets e-safety technical requirements
- The school's password policy is adhered to
- The school's filtering policy is applied and updated on a regular basis and that its implementation is not the sole responsibility of any single person
- The school's filtering provider is signed up to relevant lists (CSA content, Sexual Content, Terrorist content Your Internet Connection Blocks Child Abuse & Terrorist Content), (KCSIE 2025)
- The Co-ordinator keeps up to date with e-safety technical information
- The school's IT infrastructure (network, remote access, e-mail, VLE etc.) is monitored, in real time, in order that any misuse or attempted misuse can be reported to the Headteacher, HOY or PSO for investigation/action/sanction
- When children use the school's network to access the internet, they are protected from inappropriate content by our filtering and monitoring systems. However, many pupils are able to access the internet using their own data plan. To minimise inappropriate use, Kingstone and Thruxton Primary School does not allow children to have phones with them in school. Kingstone High School does not allow pupils to use their phones during the day and educates them about appropriate use during assembly and curriculum/pastoral time.

9.1 Pupils (to an age appropriate level)

- Are responsible for using the Academy IT systems in accordance with the Pupil Acceptable Usage Policy, which they will be required to sign before being given access to Kingstone Academy Trust's systems
- Parents/carers will be required to read through and sign alongside their child's signature
- Need to understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so

- Should understand the importance of adopting good e-safety practice when using digital technologies out of the academy and realise that the E-Safety Policy also covers their actions out of Kingstone Academy Trust, if related to their membership of the academy.

9.2 Online Safety

Each school ensures that children are safeguarded from potentially harmful and inappropriate online material. We have an effective whole school approach to online safety empowers us to protect and educate pupils, students, our staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- **Contact:** being subjected to harmful online interaction with other users; for example: child on child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes'
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group.

The Board of Trustees should ensure online safety is a running and interrelated theme whilst devising and implementing their approach to safeguarding and related policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead (and deputies) and any parental engagement (KCSIE 2025).

9.3 Online hoaxes and challenges

A hoax is a deliberate lie designed to seem truthful. A challenge will generally involve the user recording themselves taking a challenge and then distributing it – the circulation of these challenges may dare or inspire others to try it. Many challenges can be potentially harmful or life threatening. In cases of online hoaxes or challenges, we follow the Harmful Online Challenges and Online Hoaxes non-statutory DfE

guidance (published 12th February 2021). The DSL should be involved with any suspected or reported cases of online hoaxes or challenges. Each case will be reviewed individually to assess the scale and nature of possible risk to children and young people. The DSL will assess the facts of the situation and whether it is a national risk or localised to the area or institution. Local advice will be sought such as the Local Authority or police as appropriate.

10. Information Sharing and Confidentiality

Kingstone Academy Trust has regard to Information Sharing and follow the Herefordshire council guidance and procedures. Personal information about children and families held by agencies should not normally be disclosed without the consent of the subject. The law permits, however, the disclosure of confidential information necessary to safeguard the child or act in their best interests. The academy/nursery is aware that among other obligations, the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

This includes:

- Confidence in the processing conditions which allow us to store and share information for safeguarding purposes, including information, which is sensitive and personal, and is treated as 'special category personal data'

- Understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner, but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk

- For academies/nurseries, not providing pupils' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met they must withhold providing the data in compliance with academy/nursery's obligations under the Data Protection Act 2018 and the UK GDPR. Where in doubt academies/nurseries should seek independent legal advice.

DPA and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the designated safeguarding lead or a deputy. Fears

about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children (KCSIE 2025).

10.1 Pupil Information

In order to keep pupils safe and provide appropriate care for them, Kingstone Academy Trust will maintain accurate and up to date information regarding:

- Names and contact details of persons with whom the pupil normally lives
- Names and contact details of all persons with parental responsibility (if different from above)
- Emergency contact details (if different from above)
- Details of any persons authorised to collect the pupil from the academy/nursery (if different from above)
- Any relevant court orders in place including those which affect any person's access to the pupil (e.g. Residence Order, Contact Order, Care Order, Injunctions etc.)
- If the pupil is or has been the subject of a Child Protection Plan/ statutory assessment
- Name and contact detail of G.P
- Life threatening medical conditions
- Any other factors which may impact on the safety and welfare of the pupil i.e. Early Help assessments.

Kingstone Academy Trust will collate, store and agree access to this information. The Data Protection Policy informs stakeholders how and what data is shared. Parents/carers are then able to opt out of this system. The **Kingstone Academy Trust Data Manager** has control over access to information.

11. Legislation

11.1 The Human Rights Act

The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect an individual's human rights when they make individual decisions about them.

Under the HRA, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention. The specific convention rights applying to schools and colleges are:

- **Article 3:** the right to freedom from inhuman and degrading treatment (an absolute right)
- **Article 8:** the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
- **Article 14:** requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination, and
- **Protocol 1, Article 2:** protects the right to education.

Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances. Further information (including on absolute and qualified rights) can be found at Human Rights Equality and Human Rights Commission (equalityhumanrights.com).

11.2 Equality Act 2010

At Kingstone Academy Trust, we recognise that schools and colleges have obligations under the Equality Act 2010. According to the Equality Act, schools and colleges must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).

Whilst all of the above protections are important, in the context of safeguarding, this guidance, and the legal duties placed on schools and colleges in relation to safeguarding and promoting the welfare of children, governing bodies and proprietors should carefully consider how they are supporting their pupils and students with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race.

Provisions within the Equality Act allow schools and colleges to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils or students with a particular protected characteristic in order to meet their specific need, this includes a duty to make reasonable adjustments for disabled children and young people, including those with long term conditions. A school or college, could, for example, consider taking positive action to support girls if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment.

11.3 Public Sector Equality Duty

At Kingstone Academy Trust, we adhere to the Public Sector Equality Duty (PSED) which is found in the Equality Act. The PSED places a general duty on schools and colleges to have, in the exercise of their functions, due regard to the need to eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under the Equality Act), to advance equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who

do not. The duty applies to all protected characteristics and means that whenever significant decisions are being made or policies developed, specific consideration must be given to the equality implications of these such as, for example, the need to eliminate unlawful behaviours that relate to them such as sexual violence and sexual harassment, misogyny/misandry and racism.

The PSED helps schools and colleges (which are subject to it) to focus on key issues of concern and how to improve pupil and student outcomes. Some pupils or students may be more at risk of harm from specific issues such as sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination. Such concerns will differ between education settings, therefore each school policy will be conscious and reflective of disproportionate vulnerabilities that exist.

12. Safer Recruitment and Selection

The school pays full regard to 'Keeping Children Safe in Education' (DfE 2024). Safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job.

As part of the shortlisting process, KAT considers carrying out an online search, as appropriate, as part of due diligence on shortlisted candidates to help identify any incidents or issues that have happened, and are publicly available online which we might want to explore with applicants at interview.

It also includes undertaking interviews and undertaking appropriate checks through the Disclosure and Barring Service (DBS), Childcare (Disqualification) Regulations (where applicable) and prohibition order checks in respect of the following which will also include historic GTCE sanctions and EEA regulating authorities. Following best practice, the name on the birth certificate should be checked. KAT acknowledges that S128 checks should be completed on trustees. A section 128 would prohibit someone from serving as a trustee.

All recruitment materials will include reference to the school's commitment to safeguarding and promoting the wellbeing of children

12.1 Our Role in the Prevention of Abuse

In accordance with Working Together 2023, the school recognises the need to safeguard children from:

- neglect
- emotional abuse
- physical abuse
- sexual abuse

Appendix 1 contains more information about definitions and indicators

In addition, the school are alert to the need to safeguard children in specific circumstances as defined within Keeping Children Safe in Education 2025

The safeguarding policy cannot be separated from the general ethos of the school, which should ensure that children are treated with respect and dignity, taught to treat each other with respect, feel safe, have a voice and are listened to.

13. The Curriculum

We will provide opportunities for children to develop skills, concepts, attitudes and knowledge that promote their safety and well-being together with preparing children for life in modern Britain and embedding Fundamental British Values

Relevant issues will be addressed through the PSHE curriculum, delivered through the SPHERE programme, for example self-esteem, emotional literacy, assertiveness, power, sex and relationship education, online and bullying. This will be undertaken with reference to guidance around how to promote children's spiritual, moral, social and cultural development.

Issues will also be addressed through other areas of the curriculum, for example, circle time, English, History, Drama, Art.

It is noted Relationships Education (for primary pupils) and Relationships and Sex Education and Health Education (for secondary pupils) in state funded schools are mandatory

Preventative education is most effective in the context of a whole-school or college approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. The school has a clear set of values and standards, upheld and demonstrated throughout all aspects of school life. These will be underpinned by the schools behaviour policy and pastoral support system, as well as by a planned programme of evidence-based RSHE delivered through the SPHERE programme and reinforced throughout the whole curriculum.

14. Identifying those who may be Suffering Significant Harm.

Teachers and other adults in Kingstone Academy Trust are well placed to observe any physical, emotional or behavioural signs which indicate that a child may be suffering significant harm. The relationships between staff, pupils, parents and the public which foster respect, confidence and trust can lead to disclosures of abuse, and/or Kingstone Academy Trust's staff being alerted to concerns.

All staff should be aware that children may not feel ready or know how to tell someone they are being abused. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.

All staff should be aware of the importance of understanding intra familial harms and any necessary support needed for siblings following incidents. There may be ongoing risks to the victim, other children, adult students or school or college staff (KCSIE 2025, para 482). Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. Governing bodies should ensure their child protection policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- These children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- The potential for children with SEND or certain medical conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs, and
- Communication barriers and difficulties in managing or reporting these challenges
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so. (KCSIE 2025)

Any reports of abuse involving children with SEND will therefore require close liaison with the designated safeguarding lead (or deputy) and the SENCO or the named person with oversight for SEND (KCSIE 2025).

KAT considers extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place (KCSIE 2025)

Further information is found in the:

- SEND Code of Practice 0 to 25, and
- Supporting Pupils at School with Medical Conditions.

In addition, from specialist organisations:

- Mencap - Represents people with learning disabilities, with specific advice and information for people who work with children and young people

- Council for Disabled Children - Every Local area has an information, advice and support service, providing information, advice and support to disabled children and young people, and those with SEND, and their parents.

At Kingstone Academy Trust, we identify pupils who might need more support to be kept safe or to keep themselves safe by following the Special Education Provision four-part cycle:

ASSESS - This could involve a range of methods including, but not limited to, teachers' assessment of pupil progress, attainment and behaviour, results of standardised tests screening and profiling tests, questionnaires of parents and young people and observations.

PLAN - This is likely to involve the SENCO, working with teachers to plan appropriate provision, which is clearly communicated with all concerned. This may be in class support or more targeted provision. Any planning will have a clear focus on expected outcomes for the child or young person.

DO - The SEND Code of Practice places the teacher at the centre of the day-to-day responsibility for working with all pupils, it is imperative that teachers work closely with any teaching assistants or specialist staff involved to plan and assess the impact of targeted interventions.

REVIEW - The progress of pupils who are receiving SEN Support should be reviewed termly and the schools within Kingstone Academy Trust should meet with parents three times a year. This may form part of the individual Kingstone Academy Trust's regular tracking processes.

15. Safeguarding in Specific Circumstances: Domestic Abuse

Kingstone Academy Trust;

- Will ensure that staff are aware that Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

16. Safeguarding in Specific Circumstances: Children who are Vulnerable to Extremism

Kingstone Academy Trust seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements

In accordance with the Prevent Duty placed upon the school by the Counter Terrorism and Security Act 2015 we understand the specific need to safeguard children, young people and families from violent extremism**.**

Kingstone Academy Trust is clear that this exploitation and radicalisation should be viewed as a safeguarding concern

KAT understands the referral processes in place within Herefordshire should a Prevent concern arise

KAT values freedom of speech and the expression of beliefs / ideology as fundamental rights underpinning our society's values. Both children and teachers have the right to speak freely and voice their opinions - however, free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued.

KAT promotes the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs

Definitions of radicalisation and extremism and indicators of vulnerability to radicalisation are in **Appendix 4.**

16.1 Risk reduction

The Board of Trustees, the Head Teacher and the Designated Safeguarding Lead will assess the level of risk within the school and put actions in place to reduce that risk. Risk assessment may include consideration of the school's RE & SPHERE curriculum, SEND policy, assembly policy, the use of school premises by external agencies, integration of children by gender and SEN, anti-bullying policy and other issues specific to the school's profile, community and philosophy.

The school Prevent Action Plan template may be used to demonstrate how the organisation is fulfilling the Prevent duty. Please see **Appendix 12** for further information

This risk assessment will be reviewed as part of the annual s175 return that is monitored by the local authority and the local Multi Agency Safeguarding arrangements

In accordance with the Prevent Duty, **Amy Preece (KTPS) / Dave Cook (KHS)** is the Prevent Single Point of Contact (SPOC) who will be the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism

When any member of staff has concerns that a child may be at risk of radicalisation or involvement in terrorism, they should speak with the SPOC and to the Designated Safeguarding Lead if this is not the same person

If a child or young person is thought to be at risk of radicalisation advice will be sought from the Channel Team or the Multi Agency Safeguarding Hub. A referral will be made to the Multi Agency Safeguarding Hub, and if advised, information will be shared with the Channel Panel.

In all cases, in accordance with advice provided from the Channel team or Multi Agency Safeguarding Hub, the school will ensure appropriate interventions are secured which are in line with local procedures in order to safeguard children assessed as being vulnerable to radicalisation

If the school are concerned that a child may be at risk of significant harm in relation to radicalisation or involvement in violent extremism a child, protection referral will be made to the Multi Agency Safeguarding Hub

17. Safeguarding Children in Specific Circumstances: Female Genital Mutilation / Forced Marriage / Modern Day Slavery

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It can be known as female circumcision or female genital cutting and is often carried out for cultural, religious and social reasons within families and communities

FGM is illegal in the UK and it is illegal to take a British national or permanent resident abroad for FGM, or help someone trying to do this

Female Genital Mutilation Act 2003 (section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers** (along with social workers and healthcare professionals) **to report to the police** where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. This is in addition to following the school's safeguarding reporting procedures. A Teacher means any person within the Education Act 2002 (section 141A(1)) employed or engaged to carry out teaching work at schools or other institutions

Those failing to report such cases will face disciplinary sanctions

If the school is concerned that a child / young person has experienced or is at risk of FGM a Child Protection referral will be made to the Multi Agency Safeguarding Hub in accordance with interagency procedures produced by the HSCP - all teachers will follow mandatory reporting duties

Further information regarding FGM is found in **Appendix 5**

A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. It is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights

The pressure put on people to marry against their will can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological (for example, when someone is made to feel like they are bringing shame on their family). Financial abuse (taking your wages or not giving you any money) can also be a factor

The Anti-social Behaviour, Crime and Policing Act 2014 makes it a criminal offence to force someone to marry. This includes:

- taking someone overseas to force them to marry (whether or not the forced marriage takes place)
- marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured to or not)
- breaching a Forced Marriage Protection Order

Modern Slavery is the term used within the UK and is defined within the Modern Slavery Act 2015. The Act categorises offences of Slavery, Servitude and Forced or Compulsory Labour and Human Trafficking (the definition of which comes from the Palermo Protocol)

These crimes include holding a person in a position of slavery, servitude forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after.

Although human trafficking often involves an international cross-border element, it is also possible to be a victim of modern slavery within your own country

There are several broad categories of exploitation linked to human trafficking, including:

- sexual exploitation
- forced labour
- domestic servitude
- organ harvesting
- child related crimes such as child sexual exploitation, forced begging, illegal drug cultivation, organised theft, related benefit frauds etc
- forced marriage and illegal adoption (if other constituent elements are present)

18. Safeguarding Children in Specific Circumstances: Child on Child Abuse

Kingstone Academy Trust is aware that children can abuse other children (often referred to as Child on Child abuse). It can happen both inside and outside of school or college and online. It is important that all staff recognise the indicators and signs of Child on Child abuse and know how to identify it and respond to reports.

The school recognises that children can abuse other children and such behaviours are never viewed simply as 'banter' or as part of growing up. Down playing certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children. Subsequently this can normalise abuse, leading children to accept that this is normal and minimises the chances of children reporting abuse. Child on Child abuse can take many different forms such as:

- cyber-bullying
- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- physical abuse, hitting, kicking, shaking, biting, hair pulling ((this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sending or posting sexually suggestive images including nude or semi-nude photographs via mobiles or over the internet by persons aged under 18 (referred to as youth Produced Sexual Imagery)
- consensual and non-consensual sharing of nudes and semi nudes images and or videos13 (also known as sexting or youth produced sexual imagery)
- sexual assault, causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- sexual violence or harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- up-skirting (up-skirting is an illegal offence which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm)
- sexually harmful or problematic behaviour
- gang initiation or hazing type violence
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Kingstone Academy Trust understands that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have **any** concerns regarding Child on Child abuse they should speak to their designated safeguarding lead (or deputy).

Staff should be clear as to the school policy and procedures with regards to Child on Child abuse and the role they have to play in preventing it.

Kingstone Academy Trust will identify the indicators of Child on Child abuse and respond where they believe a child may be at risk from it.

Kingstone Academy Trust will reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report

Kingstone Academy Trust understand the referral pathways in response to sexual harassment and sexual violence as identified in Part 5 of KCSIE (2025).

The school will follow Sexual Violence and Sexual Harassment guidance (DfE, 2021) when responding to such issues alongside local interagency procedures and the Harmful Sexual Behaviours strategy. This includes responding to any reports in a child centred manner and undertaking an immediate risk and needs assessment in relation to the victim, the alleged perpetrator and other children. The school will respond to reports of sexual violence and sexual harassment on a case-by-case basis considering the Right Help Right Time document, whether a criminal offence may have been considered and whether a report to the Multi Agency Safeguarding Hub or the police is necessary. The school will also consider seeking specialist advice, guidance and assessment and will work with partner agencies in relation to management of information and what should be shared with staff, parents and carers.

Kingstone Academy Trust understands serious violence and what may signal that children are at risk from, or are involved in serious violent crime. Indicators may include increased absences, a change in friendships/relationships with older individuals or groups, a significant decline in performance, self-harm, significant change in wellbeing or signs of assaulted/unexplained injuries. Unexplained gifts or new possessions could indicate that children have been appropriated, or are involved with, individuals associated with criminal networks or gangs

Kingstone Academy Trust understand contextual safeguarding and will make a referral in the first instance if apparent

Kingstone Academy Trust will have sight of “Part 5 – Child on child sexual violence and sexual harassment” in KCSIE (2025) and understand how to report and respond to allegations of sexual violence or sexual harassment

19. Safeguarding Children in Specific Circumstances: Sexualised Behaviours

Where children display sexualised behaviours, the behaviours will be considered in accordance with the children's developmental understanding, age and impact on the alleged victim. Tools such as the Brook Traffic Light Tool will be used to assist in determining whether the behaviour is developmental or a cause for concern. This will assist in ensuring the child/ren receive the right support at the right time either via the Early Help Hub or a referral to Children's Social Care

Kingstone Academy Trust will utilise support and guidance from wider services such as West Mercia Rape and Sexual Assault clinic and make referrals where necessary, this includes **AIM** assessment

Kingstone Academy Trust will manage incidents of sexualised behaviour on a case by case basis, with consideration to the victim and alleged perpetrator.

In all cases of Child on Child abuse the school will consider the vulnerability of all children including those alleged to have caused the harm and those alleged to be victims and provide a safeguarding response consistent with the Right Help Right time document in Herefordshire. Consideration will be applied to violence in young people's relationships

Where necessary, the school behaviour policies will be invoked and any sanctions applied will be consistent with these procedures

Where issues indicate that a criminal offence may have been committed a report will be made to West Mercia police. The School/setting will support victims through reporting concerns to the police and will ensure the wellbeing of the child is support thereafter

Kingstone Academy Trust can seek further guidance around harmful sexual behaviours here.

20. Safeguarding Children in Specific Circumstances: Gang Related Violence (Contextual /Extra Familial Risk)

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments.

All staff, but especially the Designated Safeguarding Lead (and deputies) should consider whether children are at risk of exploitation or abuse outside of their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including, but not limited to, sexual exploitation, criminal exploitation and serious youth.

Kingstone Academy Trust is aware of indicators that may signal children are involved with serious violent crime. All staff recognise that these may include:

- Increased absences from school
- A change in friendships or groups (friendships with older children or groups)
- A decline in performance
- Changes to wellbeing or signs of self-harm
- Unexplained injuries
- Unexplained gifts and possessions (this may indicate they have been approached with individuals associated with gangs)

KAT identifies risk factors associated with children that have been permanently excluded from school. Further advice regarding youth violence is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance

The school recognises the risks posed to children in relation to involvement in gang related activity, which may be street gang, peer group or organised crime. Young people who are involved in gangs are more like to suffer harm themselves, through retaliatory violence, displaced retaliation and territorial violence with other gangs or other harm suffered whilst committing a crime. In addition, children may experience violence as part of an initiation or hazing practices

The school understands that referral can be crucial in the early identification of children who may need additional support due to gang related activity and as such will provide an appropriate response/referral to the Early Help Hub. Where there are concerns that a child or young person may be, or is at risk of becoming, involved in gang related activity, the Child exploitation team will be made aware in accordance with local procedures as part of the safeguarding response

If information suggests a child may be at risk of significant harm due to gang related activity a referral will be made to the Multi Agency Safeguarding Hub within Children's Social Care.

See Appendix 7 for further information

21. Safeguarding Children in Specific Circumstances: Youth Generated Sexualised Imagery

The school recognises the impact of online social communication and the issue of sending or posting sexually suggestive images including nude or semi-nude photographs via mobiles or over the internet. The school pay due regard to the guidance issued by the UK Council for Child Internet Safety in relation to how to respond to incidents

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, unexplainable or persistent absences from education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk.

In all cases where an incident of youth produced sexual imagery is reporting the following actions will be undertaken:

- the incident will be reported to the Designated Safeguarding Lead as soon as possible.
- the designated safeguarding lead will hold an initial review discussion or meeting with appropriate school staff.
- interviews will be held with the young people involved (if appropriate).
- parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.
- at any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to children's social care and/or the police immediately.

An immediate referral will be made to the Police and Social care in the following circumstances:

- the incident involves an adult
- there is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to special educational needs)
- the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- the imagery involves sexual acts and any pupil in the imagery is under 13
- there is reason to believe a young person is at immediate risk of harm owing to the sharing of the imagery, for example, the young person is presenting as suicidal or self-harming

If none of the above applies the school may choose to deal with the incident without involving the police or social care. This will usually be the case where the Designated Safeguarding Lead is confident that they have enough information to assess the risks

to the pupils involved and the risks can be managed within the school pastoral support and disciplinary framework.
All decisions and rationale for decision making will be recorded. All decisions will be based on the best interests of the child/ren

The school will pay due regard to the Department for Education guidance: Searching, Screening and Confiscation advice

Adults in the school will not view youth produced sexual imagery unless there is a good and clear reason to do so. Wherever possible the Designated Safeguarding Lead will respond to an incident based on what they have been told about the imagery.

All incidents will be recorded.

More information is available in Appendix 6

22. Safeguarding Children in Specific Circumstances: Child Sexual Exploitation (CSE) and Criminal Exploitation (CCE)

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or

facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

The school recognises that both boys and girls can be vulnerable to Child Sexual Exploitation and as such ensure staff are alert to signs and indicators.

The school recognises that there are various 'models' of CSE, which include but are not limited to:

- gangs and groups
- boyfriend/girlfriend model
- child on child
- familial
- online
- abuse of authority

- where concerns are identified in relation to Child Sexual Exploitation the Right Help Right time document will be consulted in order to ensure the child receives support at the earliest possible opportunity

- a multi-agency response via the Early Help Hub/MASH may be initiated through in response to a referral. Where parental consent cannot be obtained, advice will be sought from the Multi Agency Safeguarding Hub.

- if a child is thought to be at risk of significant harm through child sexual exploitation a referral will be made to the Multi Agency Safeguarding Hub within children's social care

- in all cases intelligence will be shared with West Mercia Police using the information sharing form which will also be copied to the Point Of Contact for CSE within Herefordshire Council

23. Safeguarding Children in Specific Circumstances

Further guidance in relation to safeguarding children in specific circumstances can be located in the HSCP/ Herefordshire Council procedures as listed below:

- abuse linked to spiritual belief
- child sexual exploitation
- safeguarding children vulnerable to gang activity
- supporting individuals vulnerable to violent extremism
- private fostering
- children missing from home or care
- children missing education
- children of parents who misuse substances
- children of parents with learning difficulties
- working with parents/carers with mental health problems
- working with parents/carers with disabilities
- disabled children
- protocol for dealing with domestic violence when children are involved
- online – children exposed to abuse through the digital media
- fabricated or induced illness
- Female Genital Mutilation
- forced marriage / honour based violence
- modern day slavery / human trafficking
- criminal exploitation of children across county Lines
- practice guidance & procedures to distinguish between healthy and abusive sexual behaviours in children and young people
- safeguarding children who may have been trafficked
- protocol & guidance; working with sexually active young people
- working with hostile, non-compliant clients and those who use disguised compliance
- safeguarding young people on the Autism Spectrum

23.1 Mental Health

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make diagnosis of a mental health problem. However, staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is vital that staff are aware of how these experiences, can impact on children's mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken following their child protection policy including discussion with the Designated Safeguarding Lead or deputy.

In addition, Public Health England has produced a range of resources to support secondary schools to promote positive health, wellbeing and resilience among children including its guidance 'Promoting children and young people's emotional health and wellbeing'. Its resources include social media, forming positive relationships, smoking and alcohol. See 'Rise Above: Resources for School from Public Health England #esafety | The Education People' for links to all materials and lesson plans. The Department has also published, 'Every interaction matters' a pre-recorded webinar which provides staff with a simple framework for promoting wellbeing, resilience, and mental health. This sits alongside our 'Wellbeing for education recovery' program content, which covers issues such as bereavement, loss, anxiety, stress and trauma (KCSIE 2025).

The school will access a range of advice to help them identify children in need of extra mental health support. This includes working with external agencies as described in Preventing and Tackling Bullying

23.2 Children with Additional needs

The school recognises that while all children have a right to be safe, some children may be more vulnerable to abuse. For example a young carer, a child frequently missing from home/care, children with disabilities or special educational needs, a child living with domestic abuse, parental mental ill health, or substance abuse or a child who has returned home to their family from care

The school ensures that assessment and referrals are made to support a child with additional needs at the earliest opportunity

When the school is considering either a fixed term or permanently exclusion of a vulnerable child and / or a child who is the subject of a child protection plan or where there is an existing child protection file, a multi-agency risk assessment meeting must be held prior to making the decision to exclude

In the event of a one-off serious incident resulting in an immediate decision to exclude, the risk assessment ***must*** be completed prior to convening a meeting of the Board of Trustees

23.3 Children looked after and previously children looked after.

The most common reason for children becoming looked after is because of abuse and/or neglect. Governing bodies and proprietors will ensure that staff have the skills, knowledge and understanding to keep looked after children safe. In particular, we ensure that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order) and the child's contact arrangements with birth parents or those with parental responsibility.

We also have information about the child's care arrangements and the levels of. authority delegated to the carer by the authority looking after him/her. The designated. Safeguarding lead will have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

In addition to their statutory duties, the role of virtual school heads was extended in June 2021, to include a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of children with a social worker (KCSIE 2025).

23.4 SECTION 41 – Statutory Children's social care assessments and services.

Concerns about a child's welfare should be referred to local authority children's social care. Where a child is suffering, or is likely to suffer from harm, Kingstone Academy Trust will make a referral to children's social care and if appropriate the police is made immediately. Referrals will follow the local referral process. Children's social care assessments should consider where children are being harmed in contexts outside the home. Kingstone Academy Trust provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm. Additional information is available here: Chapter one of Working Together to Safeguard Children. Examples of poor practice include:

- Failing to act on and refer the early signs of abuse and neglect
- Poor record keeping
- Failing to listen to the views of the child
- Failing to re-assess concerns when situations do not improve
- Not sharing information with the right people within and between agencies
- Sharing information too slowly
- A lack of challenge to those who appear not to be taking action.

23.4 Children potentially at greater risk of harm

Children who need a social worker (Child in Need and Child Protection Plans).

Sometimes children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances.

A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health. Local authorities should share the fact a child has a social worker, and the designated safeguarding lead may hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This will be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and Kingstone Academy Trust to safeguard and promote the welfare of children.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services). Findings from the Children in Need review, 'Improving the educational outcomes of Children in Need of help and protection' contains further information; the conclusion of the review, 'Help, protection, education' sets out action Government is taking to support this.

Any child may benefit from early help, but all staff will be particularly alert to the potential need for early help for a child who:

- Is disabled or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- Has a mental health need
- Is a young carer
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently missing/goes missing from care or from home
- Is at risk of modern slavery, trafficking, sexual or criminal exploitation
- is at risk of being radicalised or exploited
- has a family member in prison, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol themselves
- Has returned home to their family from care
- Is at risk of honour-based abuse such as Female Genital Mutilation or Forced Marriage
- Is a privately fostered child
- Is persistently absent from education.

Early Help

Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. The schools work in line with guidance in Working Together to Safeguard Children (2023)

23.5 Children who are Lesbian, Gay, Bi, or Trans (LGBTQ*).

The fact that a child or a young person may be LGBTQ is not in itself an inherent risk factor for harm. However, children who are LGBTQ can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ.

Risks can be compounded where children who are LGBTQ lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff. LGBTQ inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse (KCSIE 2025).

23.6 Right Help Right Time

All concerns will be viewed alongside Herefordshire's Right Help Right time document in order to ensure the appropriate support or intervention is provided at the earliest opportunity in the least intrusive way.

The school will also give due regard to the guidance contained in What to do if you are worried a child is being abused, 2015

In cases where it is not possible to obtain consent from the parent / carer the school will seek advice from the Multi Agency Safeguarding Hub.

The school will review each case to ensure that any support or intervention provided has impacted positively on the welfare / safety of the child or young person and that improvement is sustained

In the event that provision of Early Help has not led to improvements for the child / young person, or concerns escalate, the school will follow the step-up escalation procedures published by the local Multi Agency Safeguarding Arrangements (HSCP)
In consultation with the Right Help Right time document, if the concerns about the child or young person indicate that they may be at risk of or suffering significant harm a referral will be made to the Multi Agency Safeguarding Hub
Parents / carers will be informed of the referral unless informing them may place the child / young person at increased risk of harm

In the event of a professional disagreement in relation to a specific concern, the school will follow the HSCP procedures for resolution of professional disagreements, also known as escalation procedures

Escalation policy: Resolution of professional disagreements (procedures.org.uk)

23.7 Involving Parents / Carers

In general, safeguarding and child protection concerns will be discussed with parents / carers before approaching other agencies. Consent will be sought prior to making a **referral. Appropriate staff will approach parents / carers after consultation with the** Designated Safeguarding Lead. However, there may be occasions when the school will contact another agency before informing parents/carers because it considers that contacting them may increase the risk of significant harm to the child.

Parents / carers will be informed about the safeguarding policy through the school handbook and the school website.

23.8 Multi-agency work

The school understands its role in the three safeguarding partner arrangements. The Board of Trustees and the senior leadership teams, especially the designated safeguarding leads, will make themselves aware of and follow the local arrangements. The school works in partnership with other agencies in the best interests of the children. The school will, where necessary, liaise with the school nurse, and make referrals to children's social care.

Referrals and contacts should be made by the Designated Safeguarding Lead to either the Early Help Hub or the Multi Agency Safeguarding Hub depending on the level of need. Where the child already has a social worker the request for service will go immediately to the social worker involved or in their absence to their team manager or Duty Worker

The school will co-operate with any child protection enquiries conducted by children's social care. The school will ensure representation at appropriate inter-agency meetings such as team around the family meetings, initial and review child protection conferences, and core group meetings

The school will provide reports as required for these meetings in accordance with the Multi Agency Safeguarding Arrangements (HSCP) interagency procedures. If the school is unable to attend, a written report will be sent. The report will, wherever possible, be shared with parents / carers at least 24 hours prior to the meeting

Where a child is subject to an inter-agency child protection plan, child in need plan or early help assessment, the school will contribute to the preparation, implementation and review of the plan as appropriate.

If a child is subject to a referral to a multi-panel such as MARAC, MAGPAN or CHANNEL the school will contribute to such the school will contribute to such arrangements

24. The use of ‘Reasonable force’ in schools and other Education settings.

There are circumstances when it is appropriate for staff of KAT to use reasonable force to safeguard children and young people. The term ‘reasonable force’ covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury.

‘Reasonable’ in these circumstances means ‘using no more force than is needed’. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil’s path, or active physical contact such as leading a pupil by the arm out of the classroom.

• **Departmental advice for schools is available Use of reasonable force in schools guidance** https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools

• **Advice for colleges is available on the AOC website; Association of Colleges (aoc.co.uk).**

25. Whistleblowing

Where there are concerns about the way that safeguarding is carried out in the academy/nursery, staff should refer to the Whistle-blowing Policy. A whistleblowing disclosure must be about something that affects the general public such as:

- A criminal offence has been committed, is being committed or is likely to be committed
- A legal obligation has been breached
- There has been a miscarriage of justice
- The health or safety of any individual has been endangered
- The environment has been damaged
- Information about any of the above has been concealed.

The NSPCC runs a whistleblowing helpline on behalf of the government, the number is 0808 800 5000.

26. Allegations regarding person(s) working in or on behalf of the school/setting (including volunteers) - Including low-level concerns.

Kingstone Academy Trust has procedures for dealing with allegations against a member of staff, supply teachers, volunteers or contractors. These procedures are consistent with local safeguarding procedures and practice guidance and have regard to this guidance.

Any concerns about the conduct of other adults in Kingstone Academy Trust should be referred to the Designated Safeguarding Lead; any concerns about a Head teacher should be referred to the Chair of Trustees. Where it is alleged that anyone working in a Kingstone Academy Trust school that provides education for children under 18 years of age (including all paid or unpaid staff, supply teachers and volunteers) has:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child; and/or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children if they work regularly or closely with children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Kingstone Academy Trust will follow the procedures set out in the school's disciplinary policies and Staff Code of Conduct. This includes low level concerns. The term 'low-level' concern does not mean that it is insignificant. If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, volunteers or contractors) that does not meet the harm threshold, then this should still be shared (KCSIE 2025).

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with students
- having favourites
- taking photographs of students on their mobile phone, contrary to school/college policy
- engaging with a child/student on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating children/students

- behaving in a manner inside or outside of work which brings into question their suitability to work with vulnerable individuals

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

When dealing with allegations, we will:

- Apply common sense and judgement
- Deal with allegations quickly, fairly and consistently; and
- Provide effective protection for the child and support the person subject to the allegation.

Any repeated concerns or allegations which have all been found to be false, unfounded, unsubstantiated or malicious should not be included in any reference (KCSIE 2025).

Throughout the process in handling allegations and at conclusion of a case in which an allegation is substantiated, the LADO should review the circumstances of the case with the case manager to determine whether there are any improvements to be made to the school/setting's procedures to help prevent similar events in the future. This should include issues arising from any decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified. Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. The LADO and case manager should consider how future investigations of a similar nature could be carried out without suspending the individual (KCSIE 2025).

For all other cases, where the allegation concluded to be either, unfounded, false, malicious or unsubstantiated the case manager (and if they have been involved the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made (KCSIE 2025).

If an allegation is shown to be deliberately invented or malicious, the school should consider whether any disciplinary action is appropriate against the individual who made it as per their own behaviour policy (KCSIE 2025).

Kingstone Academy Trust should ensure that low-level concerns are shared confidentially in a way which is clear, easy to understand and implement. Whether all low-level concerns are shared initially with the DSL (or a nominated person (such as a values guardian/ safeguarding champion), or with the Head teacher / Chair of trustees is a matter for the setting to decide. If the former, then the DSL should inform the Head teacher of all the low-level concerns and in a timely fashion according to the nature of each particular low-level concern.

The Head teacher should be the ultimate decision maker in respect of all low-level concerns.

The school will ensure all staff understand the school's policy for managing allegations, including the contact details and what information the LADO will require when an allegation is made.

The LADO in Herefordshire can be contacted on 01432 261739

- the LADO may request a referral, if this is requested the referral will be completed and submitted within 1 working day
- the school will engage with the LADO at all stages of the management of the allegation / concern and comply with the Statutory Guidance contained within Keeping Children Safe in Education (2024) and the local procedures published by the HSCP.
- the school will consider whether it is necessary to suspend the member of staff while the allegation or concern is investigated. However all reasonable alternatives to manage the risk will be considered.
- due consideration will be given to the view of the LADO in relation to suspension or in-work safeguards while a matter is investigated
- should the school dismiss a member of staff/volunteer as a result of a substantiated allegation or should a member of staff/volunteer resign before an investigation has been completed, in accordance with Statutory Duty a referral to the Disclosure and Barring Service will be made.
- if the member of staff is engaged in teaching work, the school will in accordance with published guidance from the Department for Education consider whether a referral to the National College of Teaching and Leadership (NCTL) should be made
- the school will adhere to the Statutory Guidance contained within Keeping Children Safe in Education (2025) with regard to record keeping, confidentiality, references and compromise or settlement agreements

If a member of staff, student or volunteer has any concerns about poor, unsafe practice or failures of the safeguarding regime they are encouraged to raise this with the Head Teacher, Senior Leadership Team or Board of Trustees following the Whistle Blowing Procedures of the school.

The NSPCC whistleblowing helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email help@nspcc.org.uk. Please click here for information.

27. Use of Tracking Tags such as Apple AirTags (KTPS)

This guidance outlines Kingstone and Thruxton primary school's position on the use of tracking tags such as Apple AirTags on children in school and during school trips. While we understand that parents may have concerns about their child's safety, the use of such devices raises significant safeguarding, privacy, and security concerns. As such, the use of tracking tags in school and on school trips is not permitted.

Key Concerns

1. Privacy and Data Protection

- Tracking devices can raise significant privacy concerns as they can track a child's location without their informed consent.
- Schools have a duty to protect all children's personal data, and the use of tracking devices could compromise this responsibility.

2. Safeguarding Risks

- Tracking devices can inadvertently reveal the real-time location of a group of children, which poses a significant risk—especially for pupils with specific safeguarding needs.
- If lost or misplaced, a tracking device could be misused, potentially putting a child at risk.
- Parents or carers using tracking devices to post the exact location of a class or group of children on social media platforms, places the safety of all the children and staff at risk.

3. Disruption to School Trip Management

- Teachers and staff are responsible for the supervision and safety of all pupils both on site and during trips. The use of tracking devices may create unnecessary confusion and interfere with established safety protocols.
- School staff undertake extensive safety preparation and planning prior to trips. This includes robust risk assessing and contingency planning which enables them to respond to any unforeseen circumstances while away from school.

4. Other Implications

- If a pupil is carrying a tracking device, teachers or other pupils might receive alerts, creating confusion or concern.
- If a tracking device beeps unexpectedly, it could cause unnecessary panic during a school trip.
- There's a risk of unauthorised individuals detecting or following a tracking device, making it a potential security and safeguarding issue.

5. School Policy on Tracking Devices

- In line with this school guidance, personal tracking devices such as AirTags are not permitted in school or on school trips.
- Parents should trust the school's supervision and safeguarding policies, which are designed to ensure children's safety at all times.
- If parents have specific concerns about their child's wellbeing in school or on a school trip, they should communicate these directly with the school prior to the trip.
- Any tracking device found in use in school or on a school trip will be taken from the child and placed in a Faraday bag or have the battery removed for the duration of the school day / trip. We cannot guarantee that the AirTag will be returned.

6. Alternative Safety Measures

- Schools will continue to implement rigorous safeguarding procedures, including appropriate staff to pupil ratio, regular headcounts, buddy systems, and designated meeting points.
- During residential trips, school will update parents at least once a day, via email or text.
- Staff will always be available to support and supervise pupils throughout the trip.
- Parents will be provided with clear contact information, via the school office, should they need to reach staff members on the trip.
- By implementing this policy, we aim to maintain a safe, secure, and well-organised environment for all children on site and during school trips. We appreciate the cooperation of parents and carers in ensuring that school outings remain safe.

APPENDICES

Appendix 1 Definitions and Indicators of Abuse

1. Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate care-givers); or
- ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

The following may be indicators of neglect (this is not designed to be used as a checklist):

- constant hunger
- stealing, scavenging and/or hoarding food
- frequent tiredness or listlessness
- frequently dirty or unkempt
- often poorly or inappropriately clad for the weather
- poor school attendance or often late for school
- poor concentration
- affection or attention seeking behaviour
- illnesses or injuries that are left untreated
- failure to achieve developmental milestones, for example growth, weight
- failure to develop intellectually or socially
- responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings
- the child is regularly not collected or received from school; or
- the child is left at home alone or with inappropriate carer

2. Physical abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

The following may be indicators of physical abuse (this is not designed to be used as a checklist):

- multiple bruises in clusters, or of uniform shape
- bruises that carry an imprint, such as a hand or a belt
- bite marks
- round burn marks
- multiple burn marks and burns on unusual areas of the body such as the back, shoulders or buttocks
- an injury that is not consistent with the account given
- changing or different accounts of how an injury occurred
- bald patches
- symptoms of drug or alcohol intoxication or poisoning
- unaccountable covering of limbs, even in hot weather
- fear of going home or parents being contacted
- fear of medical help
- fear of changing for PE
- inexplicable fear of adults or over-compliance
- violence or aggression towards others including bullying; or
- isolation from peers

3. Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males: women can also commit act of sexual abuse, as can other children. The following may be indicators of sexual abuse (this is not designed to be used as a checklist):

- sexually explicit play or behaviour or age-inappropriate knowledge
- anal or vaginal discharge, soreness or scratching
- reluctance to go home
- inability to concentrate, tiredness
- refusal to communicate
- thrush, persistent complaints of stomach disorders or pains
- eating disorders, for example anorexia nervosa and bulimia
- attention seeking behaviour, self-mutilation, substance abuse
- aggressive behaviour including sexual harassment or molestation
- unusual compliance
- regressive behaviour, enuresis, soiling
- frequent or open masturbation, touching others inappropriately
- depression, withdrawal, isolation from peer group
- reluctance to undress for PE or swimming; or
- bruises or scratches in the genital area

4. Sexual Exploitation

Child sexual exploitation occurs when a child or young person, or another person, receives “something” (for example food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of the child/young person performing sexual activities, or another person performing sexual activities on the child/young person.

The presence of any significant indicator for sexual exploitation should trigger a referral to children’s social care. The significant indicators are:

- having a relationship of concern with a controlling adult or young person (this may involve physical and/or emotional abuse and/or gang activity)
- entering and/or leaving vehicles driven by unknown adult
- possessing unexplained amounts of money, expensive clothes or other items
- frequenting areas known for risky activities
- being groomed or abused via the Internet and mobile technology; and
- having unexplained contact with hotels, taxi companies or fast food outlets

The intelligence reporting form on the HSCP website will be used to share information with Police and children’s social care that raises a concern around CSE.

5. Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children.

These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may also involve seeing or hearing the ill-treatment of another person. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment

The following may be indicators of emotional abuse (this is not designed to be used as a checklist):

- the child consistently describes him/herself in very negative ways – as stupid, naughty, hopeless, ugly
- over-reaction to mistakes
- delayed physical, mental or emotional development
- sudden speech or sensory disorders

- inappropriate emotional responses, fantasies
- behaviours such as rocking, banging head, regression, tics and twitches
- self-harming, drug or solvent abuse
- fear of parents being contacted
- running away
- compulsive stealing
- appetite disorders - anorexia nervosa, bulimia; or
- soiling, smearing faeces, enuresis

N.B.: Some situations where children stop communication suddenly (known as “traumatic mutism”) can indicate maltreatment.

6. Responses from Parents

Research and experience indicates that the following responses from parents may suggest a cause for concern across all four categories:

- delay in seeking treatment that is obviously needed
- unawareness or denial of any injury, pain or loss of function (for example, a fractured limb)
- incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to her/his age and development
- reluctance to give information or failure to mention other known relevant injuries
- frequent presentation of minor injuries
- a persistently negative attitude towards the child
- unrealistic expectations or constant complaints about the child
- alcohol misuse or other drug/substance misuse
- parents request removal of the child from home; or
- violence between adults in the household

7. Children with Disabilities

When working with children with disabilities, practitioners need to be aware those additional vulnerabilities to abuse and neglect such as:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s disability without further exploration
- children with Special Educational Needs and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers

Possible indicators of abuse and/or neglect may also include:

- a bruise in a site that might not be of concern on an ambulant child such as the shin, might be of concern on a non-mobile child
- not getting enough help with feeding leading to malnourishment

- poor toileting
- lack of stimulation
- unjustified and/or excessive use of restraint
- rough handling, extreme behaviour modification such as deprivation of medication, food or clothing, disabling wheelchair batteries
- unwillingness to try to learn a child's means of communication
- ill-fitting equipment. for example callipers, sleep boards, inappropriate splinting
- misappropriation of a child's finances; or
- inappropriate invasive procedures

Appendix 2 Dealing with a Disclosure of Abuse

When a child tells me about abuse s/he has suffered, what must I remember?

- stay calm
- do not communicate shock, anger or embarrassment
- reassure the child
- tell her/him you are pleased that s/he is speaking to you
- never enter into a pact of secrecy with the child
- assure her/him that you will try to help but let the child know that you will have to tell other people in order to do this. State who this will be and why
- tell her/him that you believe them
- children very rarely lie about abuse; but s/he may have tried to tell others and not been heard or believed
- tell the child that it is not her/his fault
- encourage the child to talk but do not ask "leading questions" or press for information
- listen and remember
- check that you have understood correctly what the child is trying to tell you
- praise the child for telling you
- communicate that s/he has a right to be safe and protected
- do not tell the child that what s/he experienced is dirty, naughty or bad
- it is inappropriate to make any comments about the alleged offender
- be aware that the child may retract what s/he has told you. It is essential to record all you have heard
- at the end of the conversation, tell the child again who you are going to tell and why that person or those people need to know
- as soon as you can afterwards, make a detailed record of the conversation using the child's own language – include any questions you may have asked
- Do not add any opinions or interpretations

NB It is not education staff's role to seek disclosures. Their role is to observe that something may be wrong, ask about it, listen, be available and try to make time to talk.

Immediately afterwards

You must not deal with this yourself. Clear indications or disclosure of abuse must be reported to children's social care without delay, by the Head Teacher or the Designated Safeguarding Lead.

Children making a disclosure may do so with difficulty, having chosen carefully to whom they will speak. Listening to and supporting a child/young person who has been abused can be traumatic for the adults involved. Support for you will be available from your Designated Safeguarding Lead or Head Teacher.

Appendix 3 Allegations about a member of staff, trustee or volunteer

Inappropriate behaviour by staff/volunteers could take the following forms:

- **Physical**
  For example the intentional use of force as a punishment, slapping, use of objects to hit with, throwing objects or inappropriate physical handling.

- **Emotional**
  For example intimidation, belittling, scapegoating, sarcasm, lack of respect for children's rights, and attitudes that discriminate on the grounds of race, gender, disability or sexuality. Excessive or aggressive shouting

- **Sexual**
  For example sexualised behaviour towards peers, sexual harassment, sexual communication including via social networking, email, text, grooming behavior, sexual assault and rape.

- **Neglect**
  For example failing to act to protect a child or children, failing to seek medical attention or failure to meet a child's basic needs

- **May Pose a Risk**
  Behaviours that may take place outside of the workplace that present a transferable risk in their professional role with children. For example, alleged perpetrator of domestic abuse, offences demonstrating a sexual interest in children, abuse or neglect of their own children or behaviours that are incompatible with a professional role working with children.

If a child makes an allegation or raises a concern about a member of staff, trustee, visitor or volunteer the Head Teacher should be informed immediately. If the allegation or concern fall within the following criteria the LADO will be contacted at the earliest possibly opportunity and within 1 working day.

- behaved in a way that has harmed a child or may have harmed a child
- possibly committed a criminal offence against or related to a child; or
- behaved in a way that indicates s/he may pose a risk of harm to children

The Head Teacher will not carry out the investigation him/herself or interview pupils.

If a child makes an allegation of physical abuse against an adult that works with children and there are visible bruises, marks or injuries or if a child makes an allegation of sexual abuse against an adult that works with children, Child Protection procedures will be followed and a referral made to the Multi Agency Safeguarding Hub. The LADO will also be informed.

The Head Teacher must exercise, and be accountable for, their professional judgement on the action to be taken, as follows –

If the actions of the member of staff, are felt likely to fall within the scope of the interagency allegation management procedures 2, the Head Teacher will notify the LADO. (The LADO will liaise with the Head Teacher and advise about action to be taken which will be in accordance with the interagency procedures for managing allegations.

If the Head Teacher is uncertain whether the concern or allegation falls within the scope of the allegation management procedures a consultation with the LADO will take place and the advice provided will be acted upon. This consultation and the advice offered will be recorded and held on file.

Where an allegation has been made against the Head Teacher the Chair of the Board of Trustees takes on the role of liaising with the LADO team in determining the appropriate way forward. For details of this specific procedure see the Section on Allegations against Staff and Volunteers in the procedures of the HSCP.

Appendix 4 Indicators of Vulnerability to Radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

Extremism is defined by the Government in the Prevent Strategy as:
Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

Extremism is defined by the Crown Prosecution Service as:
The demonstration of unacceptable behaviour by using any means or medium to express views which:

- encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
- seek to provoke others to terrorist acts
- encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
- foster hatred which might lead to inter-community violence in the UK

There is no such thing as a "typical extremist": those who become involved in extremist actions come from a range of backgrounds and experiences. Most individuals, even those who hold radical views, do not become involved in violent extremist activity. Children may become susceptible to radicalisation through a range of social, personal and environmental factors. It is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff are able to recognise those vulnerabilities.

Indicators of vulnerability include:

Identity crisis – the child is distanced from their cultural / religious heritage and experiences discomfort about their place in society
Personal crisis – the child may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging
Personal circumstances – migration; local community tensions; and events affecting the child's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
Unmet aspirations – the child may have perceptions of injustice; a feeling of failure; rejection of civic life
Experiences of criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration
Special Educational Need – children may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

More critical risk factors could include:

- being in contact with extremist recruiters
- accessing violent extremist websites, especially those with a social networking element
- possessing or accessing violent extremist literature
- using extremist narratives and a global ideology to explain personal disadvantage
- justifying the use of violence to solve societal issues
- joining or seeking to join extremist organisations; and
- significant changes to appearance and / or behaviour
- experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis

MUU ideology (Mixed, Unclear, Unstable) is a category within the Prevent system, introduced in 2017/18 and designed to distinguish from those cases in which an individual's ideology is obvious, well-embedded and appears to be the primary factor drawing them towards TACT offences. It describes what appears to be an increasingly common phenomenon where individuals do not have a well-defined or well-understood ideological motivation. These individuals often seem drawn towards acts of extremism, extremist or terrorist groups or causes, or terrorist violence, as a means of providing them with a 'solution' to other problems in their lives. They commonly present with multiple and complex vulnerabilities.

Mixed: individuals who show interest in several (sometimes disparate) ideologies simultaneously. For example, a joint interest in right-wing extremism and involuntary celibate ("incel") content or Islamist extremism and white supremacy.

Unstable: individuals who initially appear to adhere solely to one ideology but then switch or transition to another.

Unclear: individuals whose ideological influences are less coherent and not easily identifiable. This can include individuals motivated by a hatred of a 'perceived other' without relating to prominent, well-known forms of extremism. This includes but is not limited to those who appear fixated with mass violence (such as school shootings) and incels, whose intolerance is predominantly directed at women.

Individuals referred for MUU display a variety of characteristics. These include: an interest in multiple extremist ideologies in parallel (e.g. Islamic extremism and white supremacy); switching from one ideology to another over time; targeting a 'perceived other' of some kind without specifically identifying with a particular cause; obsession with massacre or mass violence without a particular target group; and vulnerability to being drawn into terrorism out of a desire for belonging or elevated social state.

Appendix 5 Female Genital Mutilation

Female genital mutilation (FGM) is a procedure where the female genitals are deliberately cut, injured or changed, but where there's no medical reason for this to be done.

It's also known as "female circumcision" or "cutting", and by other terms such as sunna, gudniin, halalays, tahur, megrez and khitan, among others.

FGM is usually carried out on young girls between infancy and the age of 15, most commonly before puberty starts. It is illegal in the UK and is a form of child abuse.
It is very painful and can seriously harm the health of women and girls. It can also cause long-term problems with sex, childbirth and mental health.

Effects of FGM

There are no health benefits to FGM and it can cause serious harm, including:

- constant pain
- pain and/or difficulty having sex
- repeated infections, which can lead to infertility
- bleeding, cysts and abscesses
- problems passing urine or incontinence
- depression, flashbacks and self-harm
- problems during labour and childbirth, which can be life-threatening for mother and baby

Some girls die from blood loss or infection as a direct result of the procedure.

Why FGM is carried out?

FGM is carried out for various cultural, religious and social reasons within families and communities in the mistaken belief that it will benefit the girl in some way, for example, as a preparation for marriage or to preserve her virginity.

However, there are no acceptable reasons that justify FGM. It is a harmful practice that is not required by any religion and there are no religious texts that say it should be done. There are no health benefits of FGM. FGM usually happens to girls whose mothers, grandmothers or extended female family members have had FGM themselves or if their father comes from a community where it is carried out.

Where FGM is carried out?

Girls are sometimes taken abroad for FGM, but they may not be aware that this is the reason for their travel. Girls are more at risk of FGM being carried out during the summer holidays as this allows more time for them to "heal" before they return to school.

Communities that perform FGM are found in many parts of Africa, the Middle East and Asia. Girls who were born in the UK or are resident here but whose families originate from an FGM practising community are at greater risk of FGM.

Communities at particular risk of FGM in the UK originate from:

Egypt	Yemen	Eritrea	Sudan
Ethiopia	Somalia	Gambia	Sierra Leone
Guinea	Nigeria	Indonesia	Mali
Ivory Coast	Malaysia	Kenya	Liberia

The law and FGM

FGM is illegal in the UK. It is an offence to:

- perform FGM (including taking a child abroad for FGM)
- help a girl perform FGM on herself in or outside the UK
- help anyone perform FGM in the UK
- help anyone perform FGM outside the UK on a UK national or resident
- fail to protect a girl for whom you are responsible from FGM

Anyone who performs FGM can face up to 14 years in prison. Anyone found guilty of failing to protect a girl from FGM can face up to seven years in prison.

Female Genital Mutilation Act 2003 (section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers (along with social workers and healthcare professionals) to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

Possible signs and indicators of FGM

A girl or woman who has had FGM may:

- have difficulty walking, sitting or standing
- spend longer than normal in the bathroom or toilet
- have unusual behaviour after an absence from school or college
- be particularly reluctant to undergo normal medical examinations
- ask for help but may not be explicit about the problem due to embarrassment or fear.

These signs that MAY indicate a girl is at risk of FGM:

- Parents requesting additional periods of leave around school holiday times
- If the girl comes from a country with a high prevalence of FGM
- Mother and siblings have undergone FGM
- Child may indicate that they are going for a special event

Further information can be obtained for FGM guidance.:

Appendix 6 Safeguarding in Specific Circumstance: Youth produced Sexual Imagery

Youth produced sexual imagery is the sending or posting of sexually suggestive images, including nude or semi-nude photographs via mobile devices or the internet by under 18s.

This includes:

- a person under 18 creating a sexual image of themselves and sharing it with another person under 18
- a person under 18 sharing an image of another person under 18 with another person under 18 or an adult
- a person under 18 in possession of sexual imagery created by another person under 18

It does not include:

- a person under 18 sharing adult pornography
- a person under 18 sharing sexual texts without sexual imagery
- adults sharing sexual imagery of under 18s. (This is child sexual abuse and must always be reported to police.)

The Law

"Making, possessing, and distributing any imagery of someone under 18 which is indecent is illegal. This includes imagery of yourself if you're under 18."

Indecent is not definitively defined in law, but images are likely to be considered indecent if they depict:

- a naked young person
- a topless girl
- an image which displays genitals, and
- sex acts including masturbation.
- indecent images may also include overtly sexual images of young people in their underwear

These laws were not created to criminalise young people but to protect them. Although sharing sexual images of themselves is illegal and risky, it is often the result of curiosity and exploration. We believe young people need education, support and safeguarding not criminalisation.

The National Police Chief's Council has made clear that incidents of youth produced sexual imagery should be treated primarily as a safeguarding issue. However, the Police may need to be involved in cases to ensure that there is a thorough investigation including collection of evidence. If a young person has shared imagery consensually,

such as when in a romantic relationship or as a joke, and there is no intended malice it is usually appropriate for the school to manage the incident directly. In contrast, any incidents with aggravating factors, for example, a young person sharing someone else's imagery without consent and with malicious intent, should generally be referred to police and/or children's social care.

If you have any doubts about whether to involve other agencies, you should make a referral to the police

Assessing the risks

The circumstances of incidents can vary widely. If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL should conduct a further review (including an interview with the young people involved) to establish the facts and assess the risks. When assessing the risks the following should be considered:

- why was the imagery shared?
- was the young person coerced or put under pressure to produce the imagery?
- who has shared the imagery?
- where has the imagery been shared?
- was it shared and received with the knowledge of the pupil in the imagery?
- are there any adults involved in the sharing of the imagery?
- what is the impact on the young people involved?
- do the young people involved have additional vulnerabilities?
- does the young person understand consent?
- has the young person taken part in this kind of activity before?

Informing parents (or carers)

Parents (or carers) should be informed and involved in the process at an early stage unless informing the parent will put the young person at risk of harm. Any decision not to inform the parents would generally be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when the parents should be informed.

DSLs may work with the young people involved to decide on the best approach for informing parents. In some cases DSLs may work to support the young people to inform their parents themselves.

Searching devices, viewing and deleting imagery

Viewing the imagery

Adults should not view youth produced sexual imagery unless there is good and clear reason to do so. Wherever possible, responses to incidents should be based on what DSLs have been told about the content of the imagery.

If a decision is made to view imagery, the DSL would need to be satisfied that viewing:

- is the only way to make a decision about whether to involve other agencies (i.e. it is not possible to establish the facts from the young people involved)
- is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the young person or parent in making a report
- is unavoidable because a young person has presented an image directly to a staff member or the imagery has been found on a school device or network

If it is necessary to view the imagery then the DSL should:

- never copy, print or share the imagery; this is illegal
- discuss the decision with the Headteacher
- ensure viewing is undertaken by the DSL or another member of the safeguarding team with delegated authority from the Headteacher
- ensure viewing takes place with another member of staff present in the room, ideally the Headteacher or a member of the senior leadership team. This staff member does not need to view the images
- wherever possible ensure viewing takes place on school premises, ideally in the Headteacher or a member of the senior leadership team's office
- wherever possible ensure that images are viewed by a staff member of the same sex as the young person in the imagery
- record the viewing of the imagery in the school's safeguarding records including who was present, why the image was viewed and any subsequent actions and ensure the safeguarding recording procedures for the school are followed

The Education Act 2011 amended the power in the Education Act 1996 to provide that when an electronic device, such as a mobile phone, has been seized, a teacher who has been formally authorised by the Headteacher can examine data or files, and delete these, where there is good reason to do so. This power applies to all schools and there is no need to have parental consent to search through a young person's mobile phone.

If during a search a teacher finds material which concerns them and they reasonably suspect the material has been, or could be, used to cause harm or commit an offence, they can decide whether they should delete the material or retain it as evidence of a criminal offence or a breach of school discipline. They can also decide whether the material is of such seriousness that the police need to be involved.

Further details on searching, deleting and confiscating devices can be found in the DfE Searching, Screening and Confiscation advice (note this advice is for schools only)

Appendix 7 Safeguarding in Specific Circumstances: Gang Involvement

There are particular risk factors and triggers that young people experience in their lives that can lead to them becoming involved in gangs. Many of these risk factors are similar to involvement in other harmful activities such as youth offending or violent extremism.

Risk indicators may include:

- becoming withdrawn from family
- sudden loss of interest in school - decline in attendance or academic achievement
- starting to use new or unknown slang words
- holding unexplained money or possessions
- staying out unusually late without reason
- sudden change in appearance - dressing in a particular style or ‘uniform’
- dropping out of positive activities
- new nickname
- unexplained physical injuries
- graffiti style tags on possessions, school books, walls
- constantly talking about another young person who seems to have a lot of influence over them
- broken off with old friends and hanging around with a new group
- increased use of social networking sites
- starting to adopt codes of group behaviour e.g. ways of talking and hand signs
- expressing aggressive or intimidating views towards other groups of young people some of whom may have been friends in the past
- being scared when entering certain areas
- being concerns by the presence of unknown youths in their neighbourhood

This is not an exhaustive list and should be used as a guide, amended as appropriate in light of local knowledge of the risk factors in a particular area.

Appendix 8 Safeguarding in Specific Circumstances: Child Sexual Exploitation

Child sexual exploitation takes different forms - from a seemingly 'consensual' relationship where sex is exchanged for attention, affection, accommodation or gifts, to serious organised crime and child trafficking. Child sexual exploitation involves differing degrees of abusive activities, including coercion, intimidation or enticement, unwanted pressure from peers to have sex, sexual bullying (including cyber bullying), and grooming for sexual activity.

There is increasing concern about the role of technology in sexual abuse, including via social networking and other internet sites and mobile phones. The key issue in relation to child sexual exploitation is the imbalance of power within the 'relationship'. The perpetrator always has power over the victim, increasing the dependence of the victim as the exploitative relationship develops.

Many children and young people are groomed into sexually exploitative relationships but other forms of entry exist. Some young people are engaged in informal economies that incorporate the exchange of sex for rewards such as drugs, alcohol, money or gifts. Others exchange sex for accommodation or money as a result of homelessness and experiences of poverty. Some young people have been bullied and threatened into sexual activities by peers or gangs which is then used against them as a form of extortion and to keep them compliant.

The key indicators of child sexual exploitation include:

Health

- physical symptoms (bruising suggestive of either physical or sexual assault)
- chronic fatigue
- recurring or multiple sexually transmitted infections
- pregnancy and/or seeking an abortion
- evidence of drug, alcohol or other substance misuse
- sexually risky behaviour.

Education

- truancy/disengagement with education or considerable change in performance at school

Emotional and Behavioural Issues

- volatile behaviour exhibiting extreme array of mood swings or use of abusive language
- involvement in petty crime such as shoplifting, stealing
- secretive behaviour
- entering or leaving vehicles driven by unknown adults
- reports of being seen in places known to be used for sexual exploitation, including public toilets known for cottaging or adult venues (pubs and clubs)

Identity

- low self-image, low self-esteem, self-harming behaviour, e.g. cutting, overdosing, eating disorder, promiscuity

Relationships

- hostility in relationships with staff, family members as appropriate and significant others
- physical aggression
- Placement breakdown
- reports from reliable sources (e.g. family, friends or other professionals) suggesting the likelihood of involvement in sexual exploitation
- detachment from age-appropriate activities
- associating with other young people who are known to be sexually exploited
- known to be sexually active
- sexual relationship with a significantly older person, or younger person who is suspected of being abusive
- unexplained relationships with older adults
- possible inappropriate use of the Internet and forming relationships, particularly with adults, via the Internet
- phone calls, text messages or letters from unknown adults;
- adults or older youths loitering outside the home
- persistently missing, staying out overnight or returning late with no plausible explanation
- returning after having been missing, looking well cared for in spite of having no known home base
- missing for long periods, with no known home base
- going missing and being found in areas where they have no known links

Please note: Whilst the focus is often on older men as perpetrators, younger men and women may also be involved and staff should be aware of this possibility.

Social Presentation

- change in appearance
- going out dressed in clothing unusual for them (inappropriate for age, borrowing clothing from older young people)

Family and Environmental Factors

- history of physical, sexual, and/or emotional abuse; neglect; domestic violence; parental difficulties

Housing

- pattern of previous street homelessness;
- having keys to premises other than those known about

Income

- possession of large amounts of money with no plausible explanation
- acquisition of expensive clothes, mobile phones or other possessions without plausible explanation
- accounts of social activities with no plausible explanation of the source of necessary funding

This list is not exhaustive.

Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk)

Appendix 9 Operation Encompass (Domestic Abuse)

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Operation Encompass operates in all police forces across England. The process helps to support schools in providing emotional and practice help to children. Where police attend an incident of domestic abuse, whereby children live within the household, a notification will be sent to the child's school the following day to notify the school of the incident. The information provided to the school ensures that the school have up to date information for children who have experienced a domestic abuse incident within the home. Schools can use this information to provide further wellbeing support internally. Should the school feel the information provided to them, provides additional concern to existing concerns or worries, the school as per the local safeguarding procedures must be a referral into the Multi Agency Safeguarding Hub. Operation Encompass does not replace statutory safeguarding procedures.

National Domestic Abuse Helpline Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked. Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

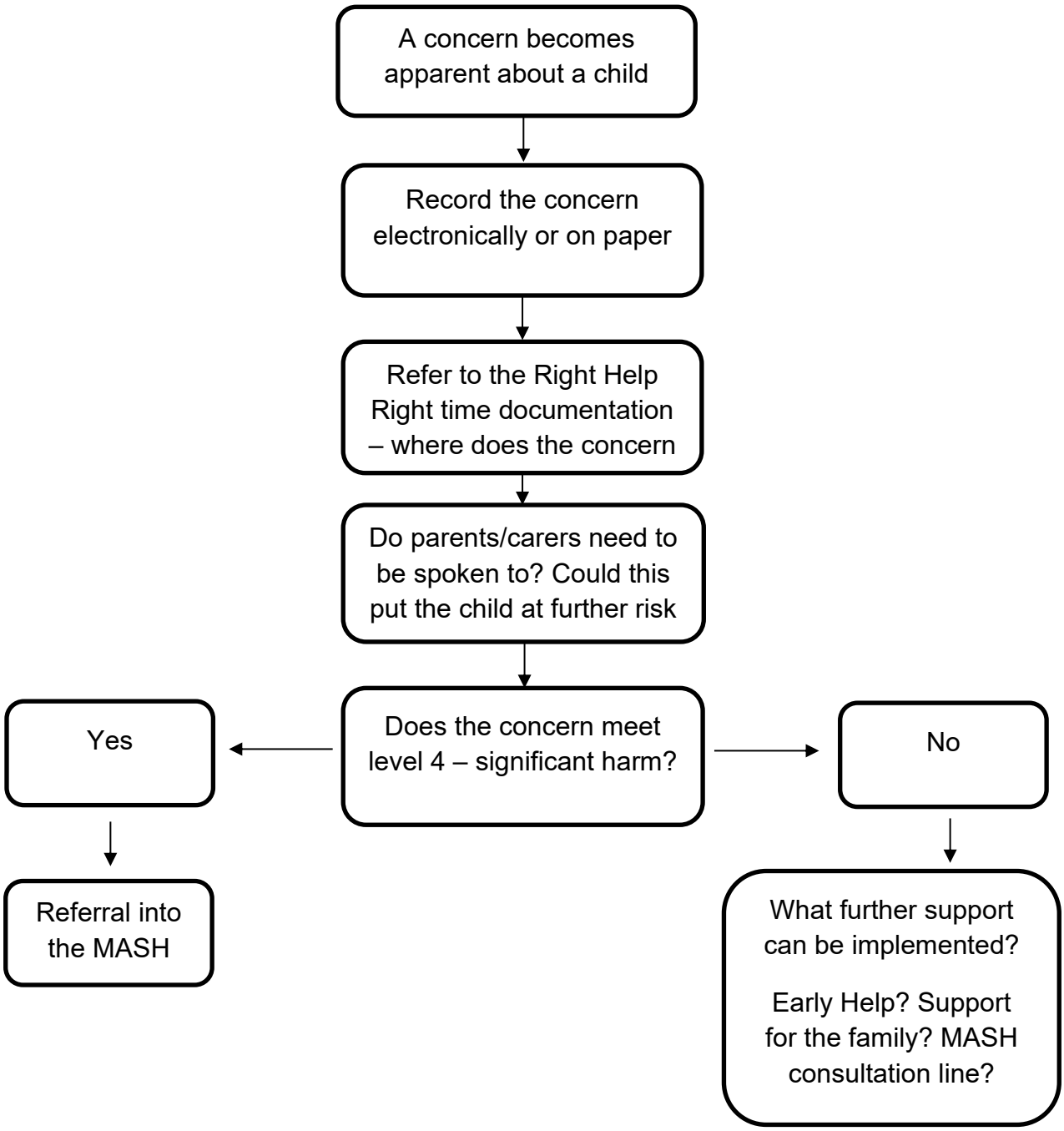
- NSPCC- UK domestic-abuse Signs Symptoms Effects
- Refuge what is domestic violence/effects of domestic violence on children
- Safelives; domestic abuse and young people
- Domestic abuse specialist sources for support
- Home: Operation Encompass

Appendix 10 Information sharing advice for Practitioners providing Safeguarding services to Children, Young People, Parents and Carers July 2018

This HM Government advice is non-statutory and has been produced to support practitioners in the decisions they take to share information, which reduces risk of harm to children and young people and promotes their well-being.
This guidance does not deal with policies for bulk or pre-agreed sharing of personal information between IT systems or organisations other than to explain their role in effective information governance.

This guidance has been updated to reflect the Data Protection Guidance for Schools (https://www.gov.uk/guidance/data-protection-in-schools) , General Data Protection Regulation (GDPR) and Data Protection Act 2018, and it supersedes the HM Government Information sharing guidance for practitioners and managers published in March 2018.The information sharing advice for practitioners providing safeguarding services to children, young people, parents and carers 2018 is listed for further reference.

Appendix 11 Model Setting Concern Process 2022



Appendix 12 Prevent in Education Risk Assessment and Practice Action Plan

	YES	NO	Existing Controls	Further Action	Staff responsible	Due Date
Does your Safeguarding Policy make explicit that the school sees protection from radicalisation and extremist narratives as a safeguarding issue?						
Are the Lead Preventive responsibilities clearly identified in the policy?						
Prevent Single Point of Contact (SPOC)/ Safeguarding Lead						
Trustee Safeguarding Lead						
Does Policy make explicit how PREVENT concerns should be reported within school?						
Prevent and Fundamental British Values considered in curriculum planning						
Does the school have clear guidance for visitors including faith related visiting speakers?						
Checks for speakers/visitors to the school?						

Checks for premises use by externals?						
Have ALL staff received appropriated training on PREVENT such as WRAP (Workshop to Raise Awareness of PREVENT)?						
Does this include support staff?						
Are there provisions for new staff induction?						
Have Governors received a Governor PREVENT briefing?						
Do all staff know what to do if they have a PREVENT concern and to whom to report it?						
	YES	NO	Comment/Evidence	Further Action	Staff responsible	Due Date
Does the E-Safety Policy refer to the requirements of the Prevent guidance?						
Appropriate filtering is in place to ensure that staff and children are unable to access unauthorised or extremist websites online through school systems						

Protocols in place to manage the layout, access and use of any space provided for the purposes of prayer and Faith Facilities.						
Clear guidance on governing the display of materials internally at the school						